

Verizon Massachusetts' Plan for Eliminating the Backlog of Double Poles

Verizon Massachusetts (“Verizon MA”) submits this Plan in accordance with the Department’s directives set forth in its Report¹ to the Massachusetts Legislature issued on November 28, 2003, in MA D.T.E. 03-87. *See* Acts of 2003, c. 46, § 110. Specifically, the Department required that utility pole owners file within 60 days of the Report “detailed plans for eliminating the backlog of double poles as soon as reasonably practicable” to facilitate compliance with Mass. Gen. Laws c. 164, § 34B. *See* D.T.E. 03-87 Report, at 15. The Department also required utility pole owners to file semi-annual reports on the status of double poles in Massachusetts.

In its Plan, Verizon MA details action items reducing of double poles on a statewide basis. Verizon MA’s Plan will remain in effect until the backlog of double utility poles it solely and/or jointly owns is entirely eliminated. Verizon MA will continue to evaluate this Plan to ensure that it satisfies its objectives and will amend the Plan, as appropriate, to achieve its goals.

¹ In its Report, the Department examined the status of double utility poles in Massachusetts and the introduction by pole-owning companies of the Pole Lifecycle Management (“PLM”) System, designed as a tool to improve enforcement of Mass. Gen. Laws c. 164, § 34B relating to the removal of double poles within 90 days. Based on its review, the Department recommended the continued statewide enforcement of Section 34B. D.T.E. 03-87 Report, at 7. This is consistent with the Department’s statutory authority to regulate electric distribution and telephone utilities, including but not limited to the removal and replacement of double poles, and consider the cost implications of such utility requirements. It also reflects the Department’s policy to ensure uniform and efficient utility services to the public. *Id.* at 8. Likewise, the Department declined to recommend the adoption of any penalties to promote compliance with Mass. Gen. Laws c. 164, § 34B. Rather, the Department found that the new PLM database as a valuable communications tool for managing the transfer of facilities and removal of double poles, and that further experience is needed to assess fully its effectiveness in that regard.

DESCRIPTION OF THE PLAN

On February 1, 2004, Verizon MA will begin to implement the following Plan to eliminate the backlog of double utility poles in Massachusetts:

1. Assign a double pole Project Manager who will report directly to the Assistant Director of Construction for Massachusetts. The Project Manager's primary responsibilities will be coordinating and overseeing all of Verizon MA's efforts to reduce the number of double poles and include:
 - ?? Coordinating Verizon MA's efforts (including project meetings, conference calls, field reviews, etc.) with those of the electric utilities and firms with facilities on poles to ensure the timely transfer of facilities and removal of double poles;
 - ?? Ensuring the accuracy and maintenance of Verizon MA's data in the PLM system;
 - ?? Organizing work efforts and prioritizing areas for remediation;
 - ?? Eliminating road blocks to performing pole work that may arise such as delays caused by other attachees, access to work areas, etc.; and
 - ?? Maintaining accurate tracking and reporting of Verizon MA's double pole reductions.
2. Dedicate 14 work crews specifically to address double pole removal work. This represents approximately 56,000 incremental man-hours annually.
3. Update Verizon MA executives regularly through monthly status reports provided by the Project Manager.

4. Provide refresher training to all Verizon MA supervisors and support personnel responsible for using and maintaining the PLM system. The training will be completed by the end of the first quarter 2004.
5. Prioritize Verizon MA's efforts by working in communities that have the highest percentage of double poles compared to the total number of double poles in Verizon MA's pole maintenance areas. Communities of interest may be incorporated to gain maximum efficiency.²
6. Conduct a new survey of all poles in the targeted community before any transfer work is initiated. The survey will be used to update the PLM system to reflect changes that may have taken place since the original survey that established the PLM database was conducted.
7. Report to the Department semi-annually on the progress made toward reducing the number of double poles across the state. The report will include information on the number of double poles removed, the communities in which work occurred, and the number of man-hours dedicated to double pole remediation over the previous six months.

OBJECTIVES OF THE PLAN

The overall objective of this plan is to eliminate double utility poles that are in place over 90 days in Massachusetts. The effort to do so is quite extensive and requires coordination and cooperation not just from co-owning electric utilities but also all other

² The first quarter target communities are shown in Attachment 1. Attachment 1 also shows the number of current double poles shown in the PLM system for each community.

pole attachees. Verizon MA has established the following milestone objectives for its double pole reduction plan.

- ?? Assignment of the Project Manager by January 30, 2004.
- ?? Complete PLM refresher training by March 31, 2004.
- ?? Assignment of 14 crews dedicated to pole work. All crews will be in place by February 2004.
- ?? Once the 14 dedicated crews are in place, Verizon MA's target will be to have a net reduction of 400 double poles on average each month.
- ?? It is estimated that all double poles beyond 90 days old will be eliminated by the end of the second quarter of 2007.³

³ Verizon MA's ability to reduce the number of double poles is greatly impacted by the number of poles that will be placed or upgraded each year. Upgrade projects by the electric utilities over the past several years have greatly increased the demand for new poles and pole upgrades. Verizon MA's commitment assumes demand for new and upgraded poles at average historic levels.